

SUPPORT FARMERS' CHOICE TO ACCESS NEW TECHNOLOGIES

WEIGH IN ON GENUITY® ROUNDUP READY® SUGARBEETS.

YOUR ACTION IS NEEDED

As a member of the American agricultural community, it is very important that you weigh in with the U.S. Department of Agriculture (USDA) on giving farmers the choice to plant Genuity® Roundup Ready® Sugarbeets (also referenced as "Glyphosate-Tolerant H7-1 sugar beets" in the Federal Register) in the future.

The USDA is currently conducting a public comment period on a draft Environmental Impact Statement (EIS) on Genuity Roundup Ready Sugarbeets, and the response will help determine the future of this beneficial technology. Comments may be submitted from October 14, 2011 to December 13, 2011.

BACKGROUND

Although Genuity Roundup Ready Sugarbeets were deregulated in 2005, and widely adopted and planted on 95 percent of all sugarbeet acreage across 10 states in the U.S. in the first five years of approval, a lawsuit brought by the Center for Food Safety and others voided USDA's Animal and Plant Health Inspection Service's (APHIS) original deregulation on procedural grounds. **A 2010 court ruling took away farmers' choice to use this technology**, even though there has been no finding of harm to the environment or to farmers who choose not to use this technology.

In 2011, the agricultural industry made progress thanks to your input and support of the draft Environmental Assessment (EA) on Genuity Roundup Ready Sugarbeets. On Feb. 4, 2011, APHIS authorized planting of Genuity Roundup Ready Sugarbeets with interim measures while it prepared a final Environmental Impact Statement (EIS) on Genuity Roundup Ready Sugarbeets.

On October 14, 2011, USDA's APHIS published a draft EIS at http://1.usa.gov/sugar_beets which examines the potential environmental impacts of Genuity Roundup Ready Sugarbeets. The Federal Register notice requests public comments on the draft EIS. The comments received during the public comment period will help determine whether or not this beneficial technology will again be deregulated, giving farmers the choice to plant Genuity Roundup Ready Sugarbeets. Comments may be submitted until December 13, 2011.

It is important for USDA to hear that the agricultural community supports advancing technology in agriculture. Moving forward, it is important for farmers to have a choice and it is important for all to be able to access new technologies that can improve agricultural productivity and farmer efficiency.

IT'S CRITICAL FOR YOU TO BE HEARD

- Farmers should have the choice to plant new and safe agricultural technologies.
- Genuity Roundup Ready Sugarbeets have been planted and harvested by farmers across the United States for five years with no finding of harm to the environment or to farmers who choose not to use this technology.
- Activist lawsuits shouldn't be a means for blocking farmer access to safe and valuable new agricultural technologies.
- New technology is needed to advance agricultural productivity to meet demand for food and improved farmer efficiency.
- Farmers should be able to count on biotech crop approvals issued by the experts in federal agencies – or at least be confident that challenges to these decisions require scientific evidence.
- Decisions regarding Genuity Roundup Ready Sugarbeets should follow the precedent established by the U.S. Supreme Court on interim measures for planting Genuity® Roundup Ready® Alfalfa. The Court's ruling confirms the importance of the ability to use safe, beneficial technologies. The decisions about agriculture technology should be based on solid data and sound science.



SUBMIT YOUR COMMENT

**ACTION:
HOW YOU CAN HELP.**

The USDA is receptive to public input. Supportive letters are important to counter negative activist comment campaigns.

Letters should be unique as the USDA counts multiple form letters as a single comment.

You can develop an effective comment and get information on how to submit it at www.supportsugarbeets.com.

You can review the USDA's draft Environmental Impact Statement at: http://1.usa.gov/sugar_beets

ONLINE INSTRUCTIONS

You can comment online at: www.supportsugarbeets.com

Complete the form provided on the Submit a Comment Page: http://1.usa.gov/sugar_beets

You can type in your comment, but you are limited to 2,000 characters.

If you have a longer comment, you can attach it as a file.

Be sure to preview your comment to make sure it is accurate.

Once you have completed the form, submitted or attached your comment, and previewed, you are ready to submit your comment.

MAILING INSTRUCTIONS

You can submit your comment by mail.

Submit your comment on your official company letterhead.

Be sure to state the docket number in the subject line – Docket No. APHIS-2010-0047.

Please mail your letter before December 6, 2011, to be sure it arrives in time to be considered.

The deadline for all comments to be received by USDA is December 13, 2011.

Mail your letter to: Docket No. APHIS-2010-0047
Rebecca L. Stankiewicz Gabel, Ph.D.
Senior Environmental Protection Specialist
USDA, APHIS, BRS
Unit 147
4700 River Road
Riverdale, MD 20737

BE SURE TO INCLUDE:

Your name.

Your city, state and county.

A date within the public comment period between October 14, 2011 to December 13, 2011.

" I support the full deregulation of sugarbeets engineered for tolerance to the herbicide glyphosate (Alternative 2)."

- SAMPLE COMMENT

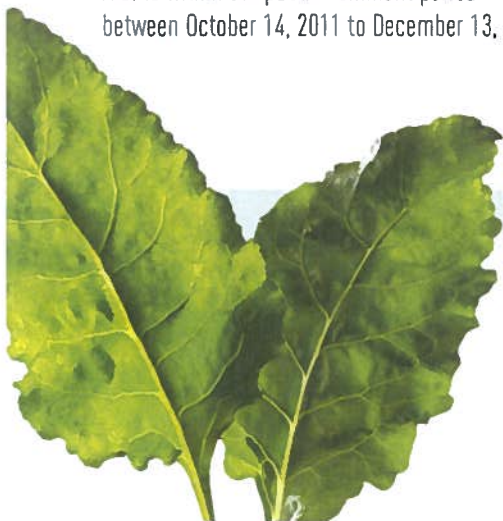
Please state that your comment refers to Docket No. APHIS-2010-0047.

For Genuity® Roundup Ready® Sugarbeets in the U.S.: On February 8, 2011, the U.S. Department of Agriculture (USDA) published its decision to implement interim measures of deregulation with conditions for the planting of Genuity® Roundup Ready® Sugarbeets root crops, and of planting under USDA permit for Genuity® Roundup Ready® Sugarbeets seed crops. Genuity® Roundup Ready® Sugarbeets can only be sold, transported and planted in compliance with the conditions imposed by USDA and as set forth in mandatory compliance agreements with USDA, which must be in place prior to transport or planting. Growers must comply with the Monsanto Technology Stewardship Agreement (MTSA) Amendment and the Genuity Roundup Ready Sugarbeets Technology Use Guide (TUG) Addendum.

For Genuity® Roundup Ready® Sugarbeets in the U.S.: The Monsanto Technology Stewardship Agreement is amended as follows: Grower agrees to transport and plant Genuity® Roundup Ready® Sugarbeets only for the production of a root crop, and not for seed production, and in compliance with the conditions imposed by the USDA under the deregulation with conditions and as set forth in mandatory compliance agreements with USDA, which grower agrees will be in place prior to transport or planting.

Monsanto Company is a member of Excellence Through Stewardship® (ETS). Monsanto products are commercialized in accordance with ETS Product Launch Stewardship Guidance, and in compliance with Monsanto's Policy for Commercialization of Biotechnology-Derived Plant Products in Commodity Crops. This product has been approved for import into key export markets with functioning regulatory systems. Any crop or material produced from this product can only be exported to, or used, processed or sold in countries where all necessary regulatory approvals have been granted. It is a violation of national and international law to move material containing biotech traits across boundaries into nations where import is not permitted. Growers should talk to their grain handler or product purchaser to confirm their buying position for this product. Excellence Through Stewardship® is a registered trademark of Biotechnology Industry Organization.

ALWAYS READ AND FOLLOW PESTICIDE LABEL DIRECTIONS. Roundup Ready® crops contain genes that confer tolerance to glyphosate, the active ingredient in Roundup® brand agricultural herbicides. Roundup® brand agricultural herbicides will kill crops that are not tolerant to glyphosate. Genuity and Design®, Genuity Icons, Genuity®, Roundup Ready®, and Roundup® are trademarks of Monsanto Technology LLC. ©2011 Monsanto Company.



Talking Points - Grower Comments

I. Grower Background/Interest

- I am a farmer
- Farm land in _____.
- Grown sugarbeets for ____ years for [cooperative] [list any sugarbeet positions with coop, growers associations, etc.]
- Other crops in my rotation include _____
- I typically farm ____ acres of sugarbeets each year.
- I have grown Roundup Ready Sugarbeets for ____ years [give percentage of sugarbeet crop that was Roundup Ready in each year] [Alternatively, in 2008, when Roundup Ready seed was first available to plant, I planted ____ % of my acres with Roundup Ready seed. In 2009, ____% of my sugarbeet acreage was RR, in 2010 ____, in 2011 ____.
- I currently grow Roundup Ready sugarbeets under compliance agreements between APHIS and _____ [insert the cooperative / processor name].

II. Support for Full Deregulation of Roundup Ready Sugarbeets

- Appreciate the hard work reflected in the draft Environmental Impact Statement prepared by APHIS
- Support proposed Alternative 2 - full deregulation of Roundup Ready Sugarbeets
- Ask that APHIS finalize the EIS as expeditiously as possible.

III. Benefits Provided by Roundup Ready Sugarbeet Technology

- Weed control is a major challenge in sugarbeet farming.
- RRSB = superior weed control, increased yields, reduced costs, reduced complexity of weed control.
- Weed control practices prior to planting RRSB:
 - Complicated and labor intensive
 - At least ____ different herbicides

- At least ___ herbicide applications
- More toxic; longer waiting periods after application before my workers can return to the fields.
- Affect the beet as well as the weeds
 - Not always effective, can be affected by weather
 - scarce and costly hand labor often required
 - Narrow window for application
- With RR - 2-3 applications gives effective weed control
- Much more flexibility in application timing, not as weather dependent
- Other environmental benefits
 - Reduced tillage
 - Fewer passes through the fields with tractor; less fuel; lower emissions
 - Reduced risk herbicides
 - Less hand labor = less human exposure to more toxic chemicals

IV. Past and future commitment to grower stewardship

- Good stewardship practices have always contributed to better yields and reduced farming challenges (like weed competition and weed resistance).
- The partial deregulation and compliance agreements did not meaningfully change the way I farm because key requirements of that program were already part of my farming practices. For example, [crop rotation, identification and control of bolters, weed resistance training, application of herbicides at required rate]
- My Technology Use Agreement with Monsanto also requires that I follow certain stewardship requirements (for example, removal of bolters, application of glyphosate in accordance with its label)
- Before planting RRSB I underwent considerable training
 - Training on the use of RR technology
 - Annual herbicide/weed resistance training
- Use of crop rotation to reduce weed pressures and likelihood of resistant weeds (through different modes of action)

- In my growing region, no risk of cross-pollination from RR sugarbeets.
 - First, don't let beets flower. Picked in first year, only flower in second year, rare first year bolters are removed and destroyed.
 - Second, even if a beet were left in the ground, it would not survive the winter in _____.
 - Third, sexually compatible table beets and chard are not grown in our region.

V. Impact or the loss of RRSB technology

- Describe the impact that the loss of RRSB technology would have on your operation
 - Reduced acreage?
 - Operating costs / profitability?
 - Other impacts?